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1 2 3	MICHAEL C. MILLS, ESQ. Nevada Bar No. 003534 BAUMAN LOEWE WITT & MAXWELL 3650 N. Rancho Dr., Ste. 114			
4	Las Vegas, NV 89130 Phone: 702-240-6060 Fax: 702-240-4267			
5	Email: mmills@blwmlawfirm.com Attorney for Defendant,			
6 7	Westrock Packaging Systems, LLC	TD107.00		
8	UNITED STATE DISTRICT COURT DISTRICT OF NEVADA			
9	DISTRICT OF NEVADA			
10	KENNETH COUNTS,	Case No.	2:23-CV-01256-J	AD-BNW
11	Plaintiff,			
12	vs.			
13 14	WESTROCK PACKAGING SYSTEMS, LLC; DOES I – X, and ROE CORPORATIONS XI-XX, inclusive			
15 16 17	Defendant.			
18 19	STIPULATION AND ORDER TO EXTEND DEFENDANT'S TIME TO REPLY TO PLAINTIFF'S RESPONSE [ECF 13] TO DEFENDANT'S EMERGENCY MOTION FOI PROTECTIVE ORDER [ECF 10]			
20	The parties, by their respective counsel, hereby agree to this Stipulation to			
21	Extend Time to Reply to Plaintiff's Response [ECF 13] to Defendant's Emergency			
22	Motion for Protective Order. [ECF 10].			
23	Defendant filed its Emergency Motion for Protective Order [ECF 10] and its			
24	Emergency Motion to Stay Deposition of Defendant's Rule 30(B)(6) Deposition [ECF 11			
25	on November 29, 2023.			
26 27				
28	STIPULATION AND ORDER TO EXTEND DEFEN RESPONSE TO DEFENDANT'S EMERGENY MO' Page 1 o	TION FOR PE		
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1 By Minute Order dated November 30, 2023, the Court granted Defendant's 2 Emergency Motion to Stay the Rule 30(b)(6) Deposition of Defendant until the Court 3 could rule on the Defendant's Emergency Motion for Protective Order. [ECF 12]. 4 Plaintiff filed his Response on December 13, 2023. [ECF 13]. The Docket entry 5 accompanying the Response directed that Defendant's Reply was due on December 20, 2023. 6 7 The Court set the hearing on the Motion for Protective Order for February 1. 2024 at 10:00 a.m. [ECF 14] 8 9 The parties have stipulated to extend the time for Defendant to Reply to Plaintiff's 10 Response until January 5, 2024. 11 STIPULATED AND AGREED TO BY: 12 Dated this 19th day of December Dated this 19th day of December 2023. 13 2023. 14 Schuetze, McGaha, Turner & Ferris, PLLC Bauman Loewe Witt & Maxwell, LLC 15 16 /s/ William W. McGaha /s/ Michael C. Mills 17 William W. McGaha, Esq. Michael C. Mills, Esq. 18 601 S. Rancho, Ste. C-20 3650 N. Rancho Dr., Ste. 114 Las Vegas, NV, 89106 Las Vegas, NV 89130 19 Phone 702-369-3225 Phone: 702-240-6060 Fax 702-369-2110 Fax: 702-240-4267 20 Counsel for Plaintiff, Counsel for Defendant. 21 Kenneth Counts, II Westrock Packaging Systems, LLC 22 **ORDER** 23 IT IS SO ORDERED. 24 Dated: 12/20/2023 25 26 27

BRENDA WEKSLER, US. MAGISTRATE JUDGE

STIPULATION AND ORDER TO EXTEND DEFENDANT'S TIME TO REPLY TO PLAINTIFF'S RESPONSE TO DEFENDANT'S EMERGENY MOTION FOR PROTECTIVE ORDER [ECF 10]

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